

**EXHIBIT A**

**Proposed Order**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

JOANN INC., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Related D.I. \_\_, \_\_

**ORDER AUTHORIZING 1903P LOAN AGENT, LLC TO (I) REDACT THE OMNIBUS REPLY OF 1903P LOAN AGENT, LLC, AS FILO AGENT, TO OBJECTIONS TO THE CASH COLLATERAL MOTION AND THE BIDDING PROCEDURES MOTION AND (II) SEAL CERTAIN EXHIBITS THERETO**

Upon the motion (the “Motion”)<sup>2</sup> of 1903P Loan Agent, LLC (“1903”) for entry of an order, pursuant to section 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1, authorizing 1903 to redact portions of the Reply, seal certain exhibits thereto, and upon the agreement of the parties to maintain confidential such materials, and directing that the unredacted and unsealed Reply remain confidential and under seal; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that the venue of this proceeding and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

<sup>2</sup> Capitalized terms used but not otherwise defined in this Order have the meaning ascribed to them in the Motion.

requested in the Motion is in the best interests of the parties in interest; and the Court having found that 1903's notice of the Motion was appropriate under the circumstances, and no other notice need be provided; and the Court having reviewed and considered the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED, as set forth in this Order.
2. 1903 is authorized to seal certain exhibits to the Reply and to redact portions of the Reply quoting from such exhibits or other confidential information, and 1903 is authorized to file the unredacted Reply under seal, which seal shall be maintained pursuant to section 107(c) of the Bankruptcy Code and Local Rule 9018-1. The information included in the unredacted Reply shall remain strictly confidential and use of such information shall be subject to Local Rule 9018-1(e).
3. The unredacted and unsealed Reply shall not be disseminated to anyone other than: (i) the Court; (ii) the U.S. Trustee; (iii) counsel for the Debtors; (iv) the Committee and its counsel; (v) the Ad Hoc Term Loan Group and its counsel; (vi) the ABL Agent and its counsel; and (vii) such other party as the Court may direct, granted that 1903 shall have an opportunity to object to such further dissemination.
4. Any party receiving an unredacted copy of the Reply shall, at all times, keep the information contained therein strictly confidential and shall not disclose such information to any party whatsoever.
5. The terms and conditions of this Order shall be effective immediately and enforceable upon its entry.

6. This Court shall retain jurisdiction with respect to all matters arising out of or related to the interpretation or enforcement of this Order.